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*Attorney for Plaintiff*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

**JAMES WHANG dba SOUTH PACIFIC  
LUMBER COMPANY,**

**Plaintiff,**

**vs.**

**IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,**

**Defendant.**

**Case No. 1:21-CV-00027**

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) and LR 16.2CJ.d of the Federal Rules of Civil Procedure, Plaintiff James Whang, doing business as South Pacific Lumber Company. ("SPLC") to serve his initial disclosures to Defendant Imperial Pacific International (CNMI), LLC ("IPI").

**A. WITNESSES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure and LR 16.2CJ.d, we offer the names of the following individuals who are likely to have discoverable information that Plaintiff may use to support their claim.

<u>Name of Witness</u>	<u>Contact Information</u>	<u>Subject of Information</u>
James Whang	c/o Colin M. Thompson Thompson Law, LLC	Mr. Whang is the sole owner of South Pacific Lumber Company, and will testify on the contracts entered between SPLC and IPI and the claims

		against the IPI.
Maribel Whang	c/o Colin M. Thompson Thompson Law, LLC	Mrs. Whang is the wife of James Whang and prepared the invoices the invoices that was sent to the IPI and the claims against the IPI.

## B. DOCUMENTS

Documents including the Warehouse Rental agreement between SPLC and IPI, emails, letters, invoices, Commonwealth Utilities Corporation bills and receipts. SPLC shall supplement these initial disclosures as necessary pursuant to Fed.R.Civ.P. 26(a)(1)(b).

## C. DAMAGES COMPUTATION

Plaintiff calculates the damages as follows:

1. Contractual Damages: \$421,800.00

All other damages identified in the Prayer of the Complaint (ECF No. 1), is subject to expert evaluation and Plaintiff will supplement this disclosures to identify the calculation. Plaintiff will also make available for inspection documents and electronically stored information supporting the calculation of damages in each category as well as interest, fees and costs associated with litigation in a timely manner.

## D. INSURANCE

Plaintiff are unaware of any insurance coverage that would provide coverage for the claims asserted in this lawsuit.

Respectfully submitted 28th day of October, 2021.

/s/ Colin M. Thompson  
**THOMPSON LAW, LLC**  
 Colin M. Thompson  
 Attorney for Plaintiff